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Clerk
District Court

JAN 12 2005

For The Northern Mariana Islands
By [Signature]
(Deputy Clerk)

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UNITED STATES DISTRICT COURT
NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA

Plaintiff,

v.

DIONICIO A. LIZAMA,

Defendant.

Criminal Case No. 04-00032

**GOVERNMENT'S MOTION FOR
SUBSTANTIAL ASSISTANCE
DEPARTURE UNDER USSG §5K1.1
AND 18 U.S.C. §3553(e)**

Pursuant to Section 5K1.1 of the United States Sentencing Guidelines, and Title 18, United States Code, Section 3553(e), the plaintiff, United States of America, hereby moves the Court to depart from the Sentencing Guidelines and the statutory mandatory minimum sentence, based on defendant's substantial assistance to the government.

The government recommends a departure from level 21 of the guidelines, to level 16. The government further recommends that defendant be sentenced at the bottom of the guideline range, **21 months**.

Respectfully submitted,

LEONARDO M. RAPADAS
United States Attorney
Districts of Guam and NMI

By:

[Signature]
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